

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: RUTH EDWARDS

CASE NO. 19-30572-H4

DEBTOR

CHAPTER 13

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS
FOR FAILURE TO MAKE PAYMENTS**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, RUTH EDWARDS ("Debtor"), by and through her attorney RADI M. RASHID, and files this Response to Trustee's Motion to Dismiss for Failure to Make Payments, and would respectfully show the Court as follows:

I.

Debtor respectfully requests that the Trustee's Motion to Dismiss be set for hearing.

II.

On November 28, 2023 the Chapter 13 Trustee filed a motion to dismiss stating:

A. The debtor is delinquent \$14,856.00, an amount constituting 2 months of required payments.

III.

Debtor would ask that the case not be dismissed, as the debtor will become current prior to the dismissal hearing date. Debtor had unexpected medical expenses occur, which caused her payments to fall behind. She is working on bringing her payments current.

WHEREFORE PREMISES CONSIDERED, and in the interest of justice and fairness, Debtor prays that the Court deny DAVID G. PEAKE, Trustee's Motion to Dismiss for Failure to Make Payments or set for hearing, and for all other relief that is just and proper.

Respectfully submitted,

RASHID LAW FIRM

/s/ RADI M. RASHID

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CERTIFICATE OF MAILING

The undersigned hereby certifies that a true and correct copy of Debtor's Response to Trustee's Motion to Dismiss was served to all parties in interest at the addresses set forth below by via first class, telephonic transmission and/or served by electronic means to all interested parties registered with the CM/ECF system on December 4, 2023.

/s/ RADI M. RASHID

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